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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

AT&T'S COMMENTS ON QWEST CORPORATION'S SUBMISSION OF
ADDITIONAL EVIDENCE REGARDING PRE-ORDER TO ORDER INTEGRATION

AT&T Communications of the Mountain States, Inc. and TCG Phoenix, (collectively, "AT&T") hereby submit their Comments on Qwest Corporation's Submission Of Additional Evidence Regarding Pre-order To Order Integration ("Qwest Information").

I. Background

The Federal Communications Commission ("FCC") has made it clear that section 271 applications must show that the integration of pre-ordering and ordering interfaces has been accomplished.¹ The Qwest Information does not dispute this fact. Qwest wants the Commission

¹ Application of SBC Communications Inc., Southwestern Bell Telephone Company, And Southwestern Bell Communications Services., d/b/a Southwestern Bell Long Distance, CC Docket No. 00-65, Memorandum Opinion and Order, FCC 00-238 (rel. June 30, 2000), ¶ 149. Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, CC Docket No. 99-295, Memorandum Opinion and Order, FCC 99-404 (rel. Dec. 22, 1999) ("BANY New York 271 Order"), ¶ 137; Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc for Provision of In-Region, InterLATA Services In Georgia and Louisiana, CC Docket No. 02-35, Memorandum Opinion and Order, FCC 02-147 (rel. May 15, 2002), ("GA/LA 271 Order"), ¶ 119.

to accept its claim that integration of the interfaces by entities other than competitive local exchange carriers ("CLECs") will adequately allow the FCC to evaluate Qwest's eventual application; it will not. Qwest does not claim that competitors have successfully integrated pre-ordering information into orders that have been processed by its systems. It claims that integration has been demonstrated by three companies that have extensive expertise in highly technical computer systems projects; and, because of their achievements, Qwest has satisfied its burden. This spin should be rejected, because the FCC wants competitors to be able to integrate pre-order and order data, not hi-tech companies that are in the business of hi-tech solutions.

II. Hewlett Packard's Obligations for the ROC Test Are Different than Those in the Arizona Test

The Regional Oversight Committee ("ROC") Master Test Plan contains the following requirement:

IIP will build a pre-order EDI interface using Qwest specifications and evaluate the results for adequacy. The data from this pre-order interface will be integrated with LSRs for ordering on a real time or near real time basis to ensure that the two interfaces can be integrated.²

The ROC test, like the Arizona test, was conducted as a military-style test, employing test-until-pass methods of resolving problems. Regardless of the extent of problems experienced by Hewlett-Packard Consulting ("HPC") in its role as the pseudo-CLEC for the ROC test in performing the integration, it was required to succeed.

The Arizona Master Test Plan requires evaluations of the parity of the level of integration between Qwest's retail and CLEC pre-ordering and ordering systems and an evaluation of the efficacy of the integration in the Functionality Test.³ The Arizona Test Standards Document, which describes how the tests are to be conducted, places the burden on the Test Administrator

² ROC MTP Version 5.2 (April 9, 2002) at 48.

(i.e., CGE&Y) to provide its evaluation of the integration quality of the CLEC interface in addition to parity with retail and the functionality of the integrated interfaces.⁴ The CGE&Y Final Report; Version 2.0, March 29, 2002,⁵ and the HPC “Pre-Order to Order Summary Report” Version 5, April 15, 2002,⁶ contend that the Qwest interfaces are integrated for GUI users and integrateable for EDI users. The results in Arizona are not made on the basis of HPC having performed the integration, because HPC did not actually do the programming to transfer pre-order responses into order documents; it merely analyzed the Qwest documentation to determine if it is possible to integrate the interfaces.

HPC’s report points out that unless a CLEC has its own hi-tech technology development department, or has the resources necessary to engage sophisticated and technologically competent systems development resources, the CLEC would not be able to integrate the EDI interfaces:

It is HPC’s professional opinion, based upon its review of Qwest documentation, that a CSR to LSR parsing would be a very challenging and complex undertaking for a CLEC with an Information Technology team that was not experienced in EDI development. Other alternatives would be to contract the development of the EDI Interface through a Service Bureau or purchase a 3rd party solution from a vendor, such as Telcordia. There will be a number of issues that will have to be clarified by meetings with Qwest. However, a CLEC with the appropriate resources, funding, time and planning activities can build a CSR to LSR parsing interface.⁷

AT&T used the workshop opportunity to determine the extent to which Qwest enables CLECs to undertake integrating EDI pre-order and ordering interfaces through its documented EDI interface development web-site references. HPC advised that there are no procedures

³ ACC MTP Version 4.2: June 29, 2001 at 14 and 18.

⁴ ACC TSD Version 2.10; September 6, 2001 See: Retail Parity, Relationship Management, and Functionality Test Sections.

⁵ CGE&Y Ex. 10-1.

⁶ HPC Ex. 10-1.

⁷ *Id.*, at 9.

documented that would advise CLECs on truncating pre-order data elements that exceed the allowable size for order entries,⁸ for configuring the Connecting Facility Assignment (“CFA”) data into the order,⁹ or for manipulating the format of the Account Number into the order.¹⁰ HPC’s witness sums up the inadequacy of the Qwest documentation on manipulating the results of pre-order queries into ordering documents thus:

MR. NEVILLE: But as far as documentation is concerned, no, a new CLEC without an experienced let’s say IT department or what have you, in my eyes I think would struggle as far as trying to build an interface based upon Qwest’s documentation.¹¹

HPC also illuminates the adequacy of Qwest’s documentation for EDI users that are considering whether to undertake an integration effort:

MR. CONNOLLY: ...tell us where in the Qwest documentation there might be a module or an instruction guide or whatever documentation that Qwest suggests a CLEC follow that would help that CLEC understand how to develop the integration or code the integration process.

MR. NEVILLE: ... But to answer your question if there’s anything specific out there, no, there’s not.¹²

III. Hewlett-Packard, Telcordia, and NightFire Do Not Compete With Qwest In the Local Service Market

The Qwest Information cites three companies that have integrated EDI interfaces and wants to leverage these achievements as demonstration that it has met its obligations. It is hard to imagine that the FCC’s objectives for integrated OSS interfaces would be met by having systems analysts, programmers, and developers employed by companies such as these three, fully engaged in projects for CLEC entrants to the local services market. HPC testified that only with high levels of IT investment and in-depth knowledge of the Qwest interfaces can integration

⁸ TR 17-18 (April 17, 2002).

⁹ *Id* at 18.

¹⁰ *Id* at 19.

¹¹ *Id* at 20.

¹² *Id* at 30.

be achieved. These companies are a testament to the fact that significant technical expertise is necessary. These are highly sophisticated companies that are in the business of solving complex systems development and engineering projects for themselves, as well as for their customers. If it takes this kind of technical talent to integrate the Qwest interfaces, competitors will have to buy the services of companies such as these to get a foot in the door for an integrated EDI interface to work. This cannot be what the FCC envisioned.

Since Qwest has designed and developed its EDI interfaces to be so complicated that only leading-edge IT outfits can integrate the interfaces, it has effectively warded off otherwise competent competitors. This violates the “meaningful opportunity to compete” standard the FCC has adopted. The position advocated by Qwest in its Information is that HPC, functioning as the pseudo-CLEC in both Arizona and the ROC, had access to the same information as does any other CLEC, concluding that if HPC can integrate EDI interfaces, anyone can; This position is flawed. HPC has expertise far and away beyond that of companies in the CLEC business. HPC, Telcordia, and NightFire have mastered EDI specifications and documentation that CLECs have not. They are not comparable to CLECs for this consideration because they are vendors of technology solutions and not competitors for end-user telephone customers.

Qwest twists the FCC opinion in the Georgia-Louisiana case to find that its interfaces have been integrated, confusing Telcordia and NightFire with competitors. The FCC stated: “As in previous section 271 proceedings, we rely primarily on evidence of actual commercial usage, submitted by competing LECs active in BellSouth’s territory and by BellSouth, that *carriers* have been able to successfully integrate certain pre-ordering and ordering functions.”¹³

¹³ *GA/LA 271 Order*, ¶122 (emphasis added).

Despite its desires to have the distinction between competitors and hi-tech companies blurred, Qwest does not satisfy the requirement that its competitors have implemented integrated pre-ordering and ordering functions. While the Telecordia and NightFire letters are interesting, they fail to serve the purpose Qwest claims they do. The users of Telcordia and NightFire integrated systems have done no integration on their own, as they are relying on the expertise and experience of the technology companies charged with figuring out the Qwest interfaces.

IV Qwest's GUI Integration Is Not Equivalent To EDI Integration

In its Information, Qwest claims that its integration of pre-order to order information within the GUI interfaces is based on the technical documentation provided to CLECs that use the EDI interfaces.¹⁴ It does not claim that its documentation provides integration support to CLECs because it has not provided such documentation at any time to the CLEC industry. Qwest alone provides the integration of its GUI interfaces, as required by the FCC. CGE&Y found this to be the case in Arizona.¹⁵ There are few, if any, parallels between GUI integration and EDI integration, just as there are few, if any, parallels between the use of the GUI by a CLEC and the use of the EDI interface by a CLEC. If one steps back far enough, the distinctions may become vague enough that they seem to disappear. This is not the way to analyze whether Qwest has satisfied its obligation to show that integration of the application-to-application interface has been accomplished by its competitors. There must be a detailed evaluation demonstrating that CLECs have commercial results from integrating the Qwest pre-ordering and ordering interfaces. Laying claim to EDI integration success on the basis of its own development of integrated GUI processes is misleading.

¹⁴ Qwest Information at 8.

¹⁵ CGE&Y Ex.10-1 at 51.

V. Conclusion

The Commission must reject Qwest's attempt to ask for recognition for the achievements of Hewlett Packard, Telcordia, and NightFire as evidence of integrating the pre-ordering and ordering functions. The FCC has clearly stated that when competitors have integrated the EDI interfaces, the RBOC has met the requirement. The Commission should require Qwest to make integration by a CLEC possible by insisting that it document the methods, procedures, and processes that will enable a CLEC to effect an integrated EDI interface. The documentation provided by Qwest could quickly be verified by Hewlett Packard to ensure that the approach designated by Qwest would offer CLECs a meaningful opportunity to integrate as a necessary step in meeting the OSS obligation of integrating pre-ordering and ordering functions.

Respectfully submitted this 28th day of May 2002.

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CERTIFICATE OF SERVICE

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